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FILED

APR 23 2021

Clerk, U S District Court
District Of Montana
Billings

gdu

ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ELIZABETH MARIE
STEPHENSON,

Defendant.

CR 21- 28 -BLG-SPW

INDICTMENT

WIRE FRAUD (Counts I-V)

Title 18 U.S.C. § 1343

(Penalty: 20 years imprisonment, \$250,000 fine, and three years supervised release)

BANK FRAUD (Counts VI-X)

Title 18 U.S.C. § 1344(2)

(Penalty: 30 years imprisonment, \$1,000,000 fine, and five years supervised release)

AGGRAVATED IDENTITY THEFT
(Counts XI-XX)

Title 18 U.S.C. §§ 1028A(a)(1)

(Penalty: Mandatory minimum two years imprisonment, consecutive to any other punishment, \$250,000 fine, and one year supervised release)

THE GRAND JURY CHARGES:

COUNTS I-V
THE SCHEME TO DEFRAUD

Beginning in approximately June 16, 2020, and continuing until approximately August 19, 2020, at Billings and within Yellowstone County, in the State and District of Montana, and elsewhere, the defendant, ELIZABETH MARIE STEPHENSON, executed a scheme and plan for obtaining money and credit by means of material false and fraudulent pretenses, representations, and omissions, in that she made payments and ATM withdrawals from John Doe's credit and checking accounts without his knowledge and authorization, and in doing so caused wire communications to be transmitted in interstate commerce.

Based on STEPHENSON's material false and fraudulent pretenses, representations, and omissions, she obtained over \$20,000 of John Doe's credit and funds and used the money for her own personal expenses, criminal defense attorney fees, and payments on her boyfriend's inmate telephone account.

INTERSTATE WIRES

On or about the dates in the table below, at Billings, within Yellowstone County, in the State and District of Montana, and elsewhere, the defendant, ELIZABETH MARIE STEPHENSON, for the purpose of executing the aforementioned scheme and artifice to defraud, and for obtaining money by means of material false and fraudulent pretenses and representations, did knowingly cause

to be transmitted in interstate commerce wire communications between a financial institution in Montana and institutions in other states, in violation of 18 U.S.C. § 1343.

Count	Date	Transaction	Amount
I	06/16/2020	Payment to California law firm	\$3,500.00
II	07/17/2020	Payment to Idaho Telmate account	\$106.00
III	07/20/2020	Payment to Idaho Telmate account	\$101.00
IV	07/24/2020	Payment to Idaho Telmate account	\$105.00
V	07/29/2020	Payment to Idaho Telmate account	\$106.00

COUNTS VI-X
BANK FRAUD

On or about the dates listed in the table below, at Billings, within Yellowstone County, in the State and District of Montana, and elsewhere, the defendant, ELIZABETH MARIE STEPHENSON, knowingly executed, and attempted to execute, a scheme to defraud Wells Fargo, a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, by means of material false and fraudulent pretenses, representations, and promises, that is the defendant, ELIZABETH MARIE STEPHENSON, presented John Doe's debit card to a Wells Fargo Automated Teller Machine and withdrew funds without his knowledge and authorization, in violation of 18 U.S.C. § 1344(2).

Count	Date	Wells Fargo ATM Location	Amount
VI	07/24/2020	1325 Main Street	\$700.00
VII	07/31/2020	2235 Grant Street	\$700.00
VIII	08/07/2020	2235 Grant Street	\$700.00

Count	Date	Wells Fargo ATM Location	Amount
IX	08/13/2020	1325 Main Street	\$700.00
X	08/19/2020	1325 Main Street	\$700.00

COUNTS XI-XX
AGGRAVATED IDENTITY THEFT

On or about the dates listed in the table below, at Billings and within Yellowstone County, in the State and District of Montana, and elsewhere, the defendant, ELIZABETH MARIE STEPHENSON, knowingly used, without lawful authority, a means of identification of another person, that is John Doe's debit and credit card numbers and Personal Identification Number, during and in relation to felony violations of 18 U.S.C. § 1343 and 18 U.S.C. § 1344(2) as charged in Counts I-X of this indictment, in violation of 18 U.S.C. § 1028A(a)(1).


Count	Date	Transaction	Account Number	Amount
XI	06/16/20	Payment to Imhoff and Associates	XXX9929	\$3,500.00
XII	07/17/20	Payment to Telmate account	XXX9929	\$106.00
XIII	07/20/20	Payment to Telmate account	XXX9997	\$101.00
XIV	07/24/20	Main Street ATM withdrawal	XXX9997	\$700.00
XV	07/24/20	Payment to Telmate account	XXX9997	\$105.00
XVI	07/29/20	Payment to Telmate account	XXX9997	\$106.00
XVII	07/31/20	Grant Street ATM withdrawal	XXX9997	\$700.00

Count	Date	Transaction	Account Number	Amount
XVIII	08/07/20	Grant Street ATM withdrawal	XXX9997	\$700.00
XIX	08/13/20	Main Street ATM withdrawal	XXX9997	\$700.00
XX	08/19/20	Main Street ATM withdrawal	XXX9997	\$700.00

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

FOREPERSON


 LEIF M. JOHNSON
 Acting United States Attorney


 for JOSEPH E. THAGGARD
 Criminal Chief Assistant U.S. Attorney

Crim. Summons ✓ 5/20/21 @ 9am
 Warrant: TJC-Bqs
 Bail: